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*Attorneys for Defendants*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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WINDSOR SECURITIES, LLC,

Plaintiff,

Case No. 1:16-cv-01533 (GBD) (GWG)

-against-

ARENT FOX, LLP and JULIUS  
ROUSSEAU, III,

Defendants.

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**NOTICE OF MOTION**

TO: Alan L. Frank, Esquire  
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PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of the Motion to Compel, the Declaration of Douglas S. Heffer, the Declaration of Julius Rousseau, III, and all the exhibits thereto, and all prior pleadings and proceedings had herein, Defendants Arent Fox LLP (“Arent Fox”) and Julius Rousseau, III (“Rousseau,” and, collectively, with Arent Fox, “Defendants”), by and through their attorneys, Foley & Lardner LLP, move this Court, before the Honorable Gabriel W. Gorenstein, United States Magistrate

Judge, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, pursuant to Rules 26, 34, and 37 of the Federal Rules of Civil Procedure, for an Order 1) compelling Plaintiff Windsor Securities, LLC (“Windsor”) to produce certain withheld documents relating to Windsor’s legal representation by counsel contemporaneous with and subsequent to Defendants, which are relevant to Windsor’s legal malpractice claims and Defendants’ related defenses, 2) awarding Defendants their reasonable expenses incurred in making this motion, and 3) providing any such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to the schedule set by the parties, as required under Magistrate Judge Gorenstein’s Individual Rule 2.B, answering papers, if any, shall be served and filed no later than June 13, 2017, and reply papers, if any, shall be served and filed no later than June 20, 2017.

Dated: New York, New York  
May 30, 2017

Respectfully submitted,

FOLEY & LARDNER LLP

By: /s/ Peter N. Wang

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